

1 complaint?

2 THE WITNESS: Yes.

3 JUDGE STIRMER: And they wanted to see what you could
4 do to give them some advice on how to correct their reception?

5 THE WITNESS: That is correct.

6 JUDGE STIRMER: All right.

7 BY MR. SHOOK:

8 Q Okay. So just to clarify, when you were doing the
9 services that are referenced in paragraph 11, the individuals
10 are, you know, paying you for your work. You are telling the
11 individual that if they have got some problem that is being
12 caused by KOKS, in addition to whatever you are doing, they
13 are supposed to call the station?

14 A Basically, yes.

15 Q Okay. And is this with a view toward getting money
16 from the station for the work that you are doing for them?

17 A It was my idea that possibly the station would
18 reimburse them for the work, yes.

19 Q Did you ever discuss this with the station, that, you
20 know, you are going to so-and-so's house and you are doing
21 some work for them and you are telling this person, you know,
22 "Well, you ought to call the station to see whether you can
23 get some reimbursement"? And do you know whether there was
24 any follow-up?

25 A I do not know if there was any follow-up.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q But at the same time, you are not telling the station
2 that you had gone to, you know, an individual's house and had
3 actually done service and told them, "Call the station to get
4 reimbursed"?

5 A No.

6 Q Okay. So the station is ignorant that you are out
7 there making these service calls?

8 A Specific service calls, yes, they are ignorant.

9 Q Okay. Did they know in a general way that you might be
10 out performing repair or restoration service?

11 A That is what I do. They would have to know I am out
12 there doing service work.

13 Q Okay. But you and the Stewarts never specifically
14 talked about, you know, whose house you went to?

15 A No, not to my recollection now.

16 MR. SHOOK: Your Honor, at this time I would like
17 marked for identification Mass Media Bureau Exhibit -- I guess
18 we are up to 29? It is a 10-page document, and it is from an
19 individual named Leatha Piper.

20 JUDGE STIRMER: What is it? A letter?

21 MR. SHOOK: Your Honor, it is a series of complaints.

22 JUDGE STIRMER: All right. The document described by
23 counsel will be marked as Mass Media Bureau Exhibit No. 29.

24 (The document was marked for identifica-
25 tion as Mass Media Exhibit No. 29.)

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 JUDGE STIRMER: Proceed, please, Mr. Shook.
2 MR. SHOOK: Okay.
3 BY MR. SHOOK:
4 Q Now, Mr. Lampe, I would like to focus your attention on
5 page 6 of what I just handed you. And I would like you to
6 read to yourself the entirety of page 6.
7 (Pause.)
8 Q Have you finished reading page 6?
9 A Yes.
10 Q Okay. Do you recall ever meeting Leatha Piper?
11 A Yes, I do.
12 Q Do you recall approximately how many times you went to
13 Leatha Piper's house?
14 A Probably 10 or more. Probably 10 or more.
15 Q Okay. Over what period of time?
16 A Over about a month.
17 Q Beginning when and ending when?
18 A Beginning just before I delivered a new TV set to her,
19 just prior to that -- I mean, following that.
20 Q Okay. When it says here that on May 23 '89 a new TV
21 was delivered, is she talking about you delivering the TV to
22 her house?
23 A No, that was delivered by another furniture store here
24 in town.
25 Q Okay. And when did you become involved with her?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A She called me because her new television wasn't operat-
2 ing properly, that the delivery people that delivered it
3 didn't seem to know how to install it.

4 Q Okay. Do you see the next sentence there, or two
5 sentences later after what I had referred to before, where it
6 begins, "On May 25"?

7 A May 23rd? Yes, May 25th. Yes.

8 Q Okay. Does that sentence there comport with your
9 recollection of what happened?

10 A Yes. My recollection is that, while on the phone, she
11 asked me to bring her out a television to replace this one,
12 the new one she had with. I did what she asked me.

13 Q Okay. And then you also did the various things that
14 she describes in here about a booster and --

15 A I spent -- yes.

16 Q -- and whatever it is that she has here. It looks like
17 a spec number TA-25, and three traps?

18 A Yes.

19 Q Okay. That comports with your recollection?

20 A Yes, it does.

21 Q Okay. Does the \$99.75 bill comport with your recollec-
22 tion?

23 A I would have to check my records at the shop to see if
24 that was correct. I am sure that is close.

25 Q Okay. Did you have any discussion with Leatha Piper

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 about who should be paying that bill?

2 A I don't recall.

3 Q Do you recall telling her that you had tried to get
4 KOKS to use the right kind of parts to service the complaints
5 but KOKS refused to do that?

6 A No, I don't recall that either.

7 Q You don't deny having said it? You just don't recall
8 whether you said it or not?

9 A I just don't recall whether I said it or not.

10 Q Okay. I would like you to turn to page 7.

11 JUDGE STIRMER: Mr. Shook, we are going to break at 1
12 o'clock for lunch.

13 MR. SHOOK: That's fine, Your Honor.

14 JUDGE STIRMER: All right.

15 BY MR. SHOOK:

16 Q Please read page 7 to yourself. It also carries over
17 to page 8.

18 (Pause.)

19 Q Okay. Going back to page 7 where it says, "I engaged
20 Charlie at my expense, and he put on a booster which worked
21 for a short time. On November 27 '89, the booster was
22 removed. At that time, another type was put on." Were you
23 involved in putting on the second booster and taking off the
24 first one?

25 A I believe I was.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q And did you or did you not tell the radio station about
2 your either May or November trips to Leatha Piper's house?

3 A I don't recall if I did.

4 MR. SHOOK: Your Honor, this would be an okay time for
5 me to break.

6 JUDGE STIRMER: All right. Off the record.

7 (Off the record.)

8 (Back on the record.)

9 JUDGE STIRMER: We will break for lunch at this time
10 and reconvene at a quarter to 2.

11 (Whereupon, at 1:00 p.m., a recess for lunch was
12 taken.)

13

14

15

16

17

18

19

20

21

22

23

24

25

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

A F T E R N O O N S E S S I O N

JUDGE STIRMER: Mr. Lampe, would you please resume the witness stand? When we recessed, Mr. Shook, you were conducting cross-examination. Would you please proceed?

BY MR. SHOOK:

Q Mr. Lampe, I would like to now direct your attention to paragraph 12 of your testimony. Okay. You do recall Mr. Poole's visit to the station?

A Yes, sir.

Q And it says that when you accompanied Mr. Poole, does that mean you walked with him around the station studio? Or where was it that you went with Mr. Poole?

A I met Mr. Poole at the studio, and we drove out to the transmitter, and he looked the transmitter site and transmitter over. And then he requested that I drive him to some of the places where the people were complaining, and I drove him to some of the complainants' houses.

Q Okay. One of the places that you drove to was the Smith residence?

A Yes, sir.

Q Okay. Now on the top of page 8, you have a sentence here that reads, "He told me that Ms. Smith was a very unhappy lady." Did he tell you why Ms. Smith was a very unhappy lady?

A I think he was referring to her television reception.

Q Okay. And your references before to Highway 51, I take

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | it you received that information from Mr. Poole about where
2 | the Channel 6 Grade B contour stops?

3 | A In talking with Mr. Poole, I don't remember if he
4 | specifically said Highway 51 or if he said that 6 doesn't come
5 | in to the area as B grade.

6 | Q Okay. I am just looking at the last sentence of
7 | paragraph 12. Now he told you that you didn't have to worry
8 | about Channel 6. And did he also tell you about the Grade B
9 | contour, or was that something that you knew from another
10 | source?

11 | A I don't recall what sources, you know. I know that I
12 | talked with Mr. Poole. I talked with Don Stewart concerning
13 | it, and I don't know the specific wording that went on. I
14 | have to say that he alluded to that fact or may have specifi-
15 | cally said it. I just don't recall.

16 | Q How many other residences besides the Smiths did you go
17 | with Mr. Poole to?

18 | A I think that -- basically I recall Ms. Smith's resi-
19 | dence. I am not for certain whether I took Mr. Poole to
20 | Mr. Hillis's house or not.

21 | Q Now the Smiths and the Hillises live very close to each
22 | other, don't they?

23 | A Right, they do. I know that Mr. Poole was in
24 | Ms. Smith's house for quite some time, and I don't remember if
25 | we went on down the hill and he went to Ms. Hillis's then,

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | because he stayed for more than one day, and I wasn't with him
2 | for the complete time that he was here. I was just with him
3 | that day. I don't remember if I was with him anymore. I know
4 | that he did show me all of his equipment, the inside of his
5 | truck; just, you know, engineer technician, that kind of
6 | thing. But specifically I don't remember. I know specifi-
7 | cally that we did go to Ms. Smith's, but I don't remember if
8 | we went to Ms. Hillis's that time or not.

9 | Q Okay. Do you remember going to anybody else's house?

10 | A Not with Mr. Poole.

11 | Q Okay. When Mr. Moffit and Ms. Raines came from Kansas
12 | City to inspect the station in December of 1989, and that
13 | states that you did not accompany them during their inspec-
14 | tion. Now does that mean that you did not accompany them when
15 | they were inspecting the radio station?

16 | A The only time that I talked with Mr. Poole, or
17 | Mr. Moffit and Ms. Raines was over the phone. I don't know
18 | what they look like. I don't believe I have ever seen them
19 | face to face.

20 | Q Okay. Now in the middle of paragraph 13, or should I
21 | say, I guess it is the second-to-the-last sentence, it reads:
22 | "Mr. Moffit told me that they had tried a number of filters at
23 | the Smith and Hillis house without success." Did Mr. Moffit
24 | tell you what filters were used?

25 | A No, he didn't.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Moving on to paragraph 14. Can you look at the first
2 sentence, please?

3 A Yes.

4 Q It talks about, "Mr. Stewart called me and asked me to
5 find something that would work to restore reception to
6 Channel 6." Now was that the only problem that you had to
7 concern yourself with?

8 A At this time?

9 Q Yes, sir.

10 A With the station?

11 Q Right.

12 A Technically, of course, we had the normal maintenance
13 problems.

14 Q Okay. My question was not well put. With respect to
15 the blanketing situation, was Mr. Stewart's concern only
16 Channel 6?

17 A Specifically, that's what he told me.

18 Q Okay. He wasn't concerned about the other television
19 channels?

20 A I don't know what his concern was. You know, he didn't
21 convey that to me. I, and I can speculate as to his thinking
22 behind it, but I won't.

23 Q No, I don't need you to do that. What about FM radio
24 reception? Was any concern expressed for restoration of FM
25 radio reception?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A No.

2 Q Now the research that you are referring to in the
3 second sentence of paragraph 14, is that research for the
4 purpose of finding a filter that would restore reception to
5 Channel 6?

6 A Yes.

7 Q Now I would like you to refer to Exhibit 3. That is
8 Nina Stewart's testimony. There is an attachment at the end.
9 We went over a little bit of it this morning. Do you see
10 that, beginning "Radio World"?

11 A Uh-huh.

12 Q May 1, 1988. Now do you recall when you first read
13 that article? Or excuse me. I should probably preface this.
14 Have you ever read that article?

15 A I don't remember ever reading, ever seeing the article.

16 Q Okay. You don't recall Ms. Stewart or Mr. Stewart ever
17 bringing this article to your attention?

18 A I don't recall them doing it. No, I don't recall it.

19 Q Okay. I would like to turn the page here. Now if you
20 would -- this is on page 17, Your Honor, of the "Radio World"
21 article, the second paragraph. There is a reference to a
22 Blonder Tongue filter.

23 A Uh-huh.

24 Q Is this the first time that you have ever heard of such
25 a filter?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A It is the first time I have heard of that particular
2 filter.

3 Q I mean, you weren't aware of this filter before today?

4 A No.

5 Q Now other than the Microwave Filter Company filter that
6 you reference here in paragraph 14, which appears at the
7 bottom of page 8, before you saw the advertisement for that
8 filter, what filters and traps would you have used to deal
9 with an FM blanketing interference problem?

10 A An Archer trap was tried. A Channel Master tunable
11 trap was tried, and a Wineguard tunable trap was tried.

12 Q Okay. First was the Archer. What is the Archer trap
13 designed to do?

14 A Well, it is just a broad-band FM trap.

15 Q Okay. And what is the Channel Master trap designed to
16 do?

17 A It is actually designed to trap out an adjacent tele-
18 vision station.

19 Q Okay. Could you give me some example of how that might
20 work?

21 Q Okay. If you were having problems with, say, a strong
22 Channel 5 coming in on top of Channel 6, or also they recom-
23 mended that you could tune it for an FM notch.

24 Q Okay. Viewing it more or less is like a Channel 7, if
25 in fact Channel 7 were to follow Channel 6? Is that true?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Yes. I think actually the mid-band frequency of the
2 trap is at Channel 6.

3 Q Okay. And the Wineguard trap. What was that designed
4 to do?

5 A The same thing as the Channel Master.

6 Q Okay. Were the Archer traps purchased by the station,
7 or were these traps that you yourself had used?

8 A These were traps that the station had used prior to me
9 coming to work for them.

10 Q Do you have any knowledge as to how much those traps
11 cost?

12 A I think about \$4.

13 Q And do you know where they can be purchased?

14 A Radio Shack locally.

15 Q And the Channel Master traps, do you have any knowledge
16 as to how much they cost?

17 A They have to come through a Channel Master distributor.
18 At that time, local Tri-State Electronics was the Channel
19 Master distributor, and they could order them. They are not a
20 normal stock item.

21 Q And if they were ordered, you know, what would the
22 normal cost for a filter be?

23 A They ran approximately \$40 for the Channel Master
24 version.

25 Q Okay. One filter would cost \$40?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A That is correct.

2 Q And if they were purchased in lots of 100, would that
3 cost --

4 A Channel Master? I don't know. I never did try to see
5 what it would cost to purchase those in lots of 100.

6 Q All right. In other words, the Channel Master trap was
7 again something that the station had previously purchased?

8 A No, this was something that I purchased.

9 Q Something that you purchased?

10 A Prior to going to work for the station.

11 Q Okay. This was something that you would ordinarily use
12 then to deal with a blanketing problem?

13 A This was one of the many things that I tried prior to
14 going to work for KOKS to help the people that I was working
15 for.

16 Q All right. With respect to the Wineguard filter, where
17 would you get that, and how much would that cost?

18 A There again it would have to come from a Wineguard
19 distributor. If memory serves, it was about \$25 or \$28,
20 somewhere in there.

21 Q And was this something that you yourself purchased or
22 something that the station --

23 A Yes, this was something I purchased.

24 Q When you were speaking with the Microwave Filter
25 Company in order to, you know, determine what filter you

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | should get, what explanation did you give of the problem that
2 | you were facing?

3 | A I explained to them that we had an FM blanketing
4 | problem and asked them if they had a filter they recommended
5 | that was cut exactly to the station frequency.

6 | Q In other words, 89.5?

7 | A That is correct.

8 | Q And was 89.5 the only signal that the filter was
9 | supposed to suppress then?

10 | A It suppressed 89.5, and of course it had its frequency
11 | loss.

12 | Q Okay. Can you explain to us what that is all about?

13 | A Anytime that you put anything in line with a receiving
14 | antenna, you have a certain amount of loss to certain frequen-
15 | cies.

16 | Q Okay. Would that be safe, for example, to desired
17 | frequencies? In other words, if you got a filter in and it is
18 | going to cut out 89.5 and you want to receive Channel 12, TV
19 | Channel 12, is it going to affect how much of TV Channel 12
20 | actually reaches the receiver?

21 | A It is going to affect it to some extent. The further
22 | away the frequency is from the filter, normally the less it is
23 | affected by the filter.

24 | Q So, in other words, there would be a greater effect on
25 | Channel 8 than there would on Channel 12?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Yes.

2 Q And a greater effect on Channel 6 than there would be
3 on either Channels 8 or 12?

4 A Yes.

5 Q Was there any means used to try to bring the signal
6 strength back up again as a result of the loss that was going
7 to occur because of the filter?

8 A According to the manufacturer, the adjacent channel
9 loss was minimal, like less -- they said less than 5 dB to
10 Channel 6 and negligible to channels out of that range.

11 Q Okay. Was there any step taken to suppress the IF beat
12 frequency that you had referred to in paragraph 7 of your
13 testimony?

14 A Of the Highway Patrol?

15 Q Well, no, I am not specifically speaking of the Highway
16 Patrol at this point. If you go back to paragraph 7 of your
17 testimony, there was mentioned a phenomenon called IF beat.
18 And as I recall from your testimony, that it is supposed to be
19 the difference of the KOKS frequency and the Highway Patrol
20 frequency.

21 A No. The only filter we put on was an 89.5 cut trap.

22 Q Now the IF beat frequency, though, is something that
23 occurs as a consequence of the existence of KOKS? Correct?

24 A Are you saying specifically the frequency that you see
25 when the Highway Patrol comes on the air?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q It is the Highway Patrol plus KOKS, isn't it?

2 A Yes.

3 Q And if KOKS weren't there --

4 A You would still the Highway Patrol.

5 Q But you wouldn't see the IF beat?

6 A You would see the same type of thing on the screen.

7 Q The same type? Would it be to the same extent?

8 A No.

9 Q It would be less? Right?

10 A Yes.

11 Q Now did you happen to see the FCC -- in other words,

12 the Federal Communications Commission -- order which caused or

13 led to Mr. Stewart's request to you for help with home visits?

14 A Not before the home visits. I think I am aware of most

15 of the stuff that has transpired since.

16 Q Okay. Rather than keep you in the dark, let me show

17 you what I am talking about.

18 A Okay.

19 MR. SHOOK: Your Honor, I am bringing the witness's

20 attention to Mass Media Exhibit No. 25.

21 (Pause.)

22 BY MR. SHOOK:

23 Q My question was: Is this the first time that you are

24 seeing Mass Media Exhibit 25?

25 A Yes.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q The Stewarts hadn't shown you this before you went out
2 on home visits?

3 A Not, not that I recall.

4 Q Okay. I want to focus your attention specifically on
5 footnote 5.

6 A Okay.

7 Q Okay. Now I believe we have already established that
8 you went to Leatha Piper's house on a number of occasions --

9 A Yes.

10 Q -- during 1989?

11 A Yes.

12 Q Is there any other name there whose house you went to
13 during 1989?

14 A In this list?

15 Q On footnote 5.

16 A I recognize the name Libla, but I am not absolutely
17 sure that is the same Libla that I have done work for.

18 Q Okay. And what is it about that name that you know?

19 A I don't remember her first name.

20 Q Okay. But it was a woman, though?

21 A Yes.

22 Q Okay. And you went to her house to do what?

23 A Install a satellite system.

24 Q Okay. And do you have any recollection as to when you
25 did that?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A My guess would be four to five years ago.

2 Q All right. And there is no other name on that list
3 that you recognize?

4 A Not from service, no.

5 Q Okay. Now moving on to paragraph -- well, actually,
6 concluding with paragraph 14. The next-to-the-last sentence
7 that reads, "They told me that the specifications for the
8 filter that they had made would suppress the signal filtered
9 by 60 dB." The signal filtered in this case was the 89.5.
10 Right?

11 A Yes.

12 Q And what is the significance of filtering the signal 60
13 dB?

14 A Every 3 dB's have power. It is a comparison of what
15 you have got versus what you have, what you have got going in
16 and what you have got coming out. The FCC considers 60 dB
17 very near perfect.

18 Q Well, in terms of -- okay. So your understanding would
19 then be, if the signal to be suppressed was going to be sup-
20 pressed by 60 dB, essentially it took the signal out?

21 A Essentially.

22 Q Okay. Moving on to paragraph 15, did there come a time
23 when Mr. Stewart stopped coming to homes with you and
24 Ms. Stewart?

25 A There was a time, yes.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q And do you know what occasioned that?

2 A I think Mr. Stewart became ill.

3 Q Do you know what the nature of his illness was?

4 A Not specifically.

5 Q Okay. When you went to the persons' homes, this
6 grouping now of, apparently it is over 100. I guess it is
7 105?

8 A Yes.

9 Q What was it that you were shown, or were you shown
10 anything prior to going in a person's home in terms of what
11 that person's problems were?

12 A Most of these homes were the first time I had been in
13 their homes specifically. They would show me their television
14 set, and I would try to filter out their television set or in
15 various areas of their antenna system to remove the inter-
16 ference.

17 Q Right. But were you shown any document that described,
18 you know, what the person's complaint was?

19 A No.

20 MR. SHOOK: Okay. Your Honor, I want to place before
21 the witness a document. I will show it to all of you.

22 JUDGE STIRMER: Very well.

23 BY MR. SHOOK:

24 Q Okay. Mr. Lampe, the document that I am placing before
25 you bears a date of 12/3/90, and it has got KOKS's address on

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 the top, and it says who it was sent to. Have you ever seen a
2 document such as this before? I think the only page you have
3 to concern yourself with --

4 A Is just this page here?

5 Q Yes, sir.

6 A I don't recall if I have seen this particular type
7 of --

8 Q Right. I am referring now to the type of document.

9 A Right.

10 Q I am not so much referring to the particular person who
11 is named there.

12 A Right. I don't recall if I have.

13 Q Now what was your understanding of what it was you were
14 supposed to do when you went into an individual's home? You
15 know, these 105 homes?

16 A It was my understanding that I was to install the
17 filters that we had in an effort to restore good reception to
18 the household, excluding portable devices.

19 Q Okay. And what definition was given to you of "por-
20 table devices"?

21 A Anything with a handle or rabbit ears attached.

22 Q Okay. So let us say we are going into the home of an
23 individual who is 70 years old and upwards, and it is a
24 19-inch TV. It has got a handle and it has got rabbit ears.
25 Now is that supposed to be excluded from having a filter put

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 on?

2 A It was my understanding that it should be, but we did
3 install filters on an awful lot of those type sets.

4 Q Okay. What was your understanding as to what was
5 supposed to be excluded pursuant to the station's instruc-
6 tions, and what in fact did you actually do?

7 A Okay. I was instructed concerning the portable items.
8 Yet, if the portable item was the only item there, we
9 installed a filter on that item for the people. I was also
10 instructed that we were not to be concerned with antenna
11 systems that had antenna amplifiers or boosters or with very
12 high-gain antennas, but we did install filters in homes that
13 had high-gain antennas and boosters on the system. And I
14 understood that we were not supposed to be worried with VCRs,
15 but we did install filters on some VCRs.

16 Q How many of those 160 filters did you use up?

17 A I really cannot -- I can't answer that. I didn't keep
18 count of the filters. I know that at homes we used only one
19 filter; at some homes we used up to three or four filters,
20 depending on the situation.

21 Q Wasn't it generally the case, though, that in virtually
22 every home you went into that you just used one filter on one
23 TV?

24 A I would say most, most homes.

25 Q Okay. "Virtually every" is too much? Right?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Right.

2 Q "Most homes" meaning what? At least 80 percent of the
3 homes?

4 A I would say, yes, at least 80 percent.

5 Q Now what, if any, instructions were you given relative
6 to restoring FM radio service?

7 A I wasn't given any instructions.

8 Q Were the filters that you had designed for the purpose
9 of eliminating a signal to an FM radio also? Or was this
10 something that was peculiar to a television?

11 A No, they would work on an FM radio antenna also.

12 Q Was anything said about radios at all?

13 A No, sir.

14 Q Now do you recall your visit to the Smith household?

15 A Yes, I do.

16 Q It is on paragraph 16, I believe. And the antenna lead
17 wire, your testimony was, or is, that it was not hooked up at
18 all?

19 A The antenna lead wire was hooked up to the antenna
20 termination block, but the antenna was not hooked up to the
21 termination block.

22 Q Okay. You are going to have to explain that a little
23 bit to me. I am at a loss as to what that means.

24 A Some antennas employ a method of hooking the antenna to
25 a central block or a piece of plastic with screws in it.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 There's criss-cross elements that go from element to element,
2 hooking all of your antenna together, making it in face. And
3 when you come to the end of the last element, there's two
4 little wires that are just there, and you put those wires on
5 that block and then hook your lead wire to that. If those
6 wires are not hooked to that block, then your antenna is not
7 hooked to the lead wire.

8 Q Okay. So what we are talking about here is that the
9 antenna was partially connected but not totally connected?

10 A The antenna was actually not connected.

11 Q Not connected at all?

12 A No.

13 Q Okay. Now do you recall what called to reception of
14 Channel 15 at the Smith household when the antenna lead wire
15 was hooked up?

16 A Yes. We got ghosts.

17 Q Okay. And what was the picture like beforehand?

18 A It was snowy. It, I wouldn't want to say very snowy
19 because this television was in the basement.

20 Q Okay. But the picture did clear up some?

21 A The picture, what picture was there cleared, but there
22 were so many ghosts it was hard to watch.

23 Q Uh-huh, okay. Now there is a reference in your testi-
24 mony, let me see if I can find it. Oh, okay. One, two,
25 three, four, five, six, seven, eight, nine. Nine lines up

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 from the bottom of page 10, there is a sentence that reads,
2 "There was no combiner hooked into the set." Can you tell us
3 what a combiner is?

4 A It is a device where if you are running two separate
5 frequencies from an antenna -- say UHF, VHF, for instance.
6 You run them down one lead wire instead of separate lead
7 wires. And then when you get to the television set now, the
8 older sets have separate UHF/VHF inputs for their tuners. You
9 had to split that signal there. If you didn't, your UHF
10 wasn't hooked up to the antenna. So this combiner/splitter
11 separates the UHF from the VHF and then puts them where they
12 belong in the set.

13 Q Okay. So, in other words, now this set had no
14 combiner, so that would have an effect on the reception of
15 Channel 15?

16 A Yes, it would.

17 Q Okay. But by hooking up the lead wire, the antenna
18 lead wire, you could still improve the picture of Channel 15?

19 A The situation with hooking it to that antenna was that,
20 yes, it would improve the picture, but you had to put up with
21 the ghosts.

22 Q Okay. And the combiner would do -- that would elim-
23 inate the ghosts?

24 A No.

25 Q Or reduce the number of ghosts?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947